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Attorney for SECURED CREDITORS
LOS ANGELES, MONTEREY, and
SAN BERNARDINO, CALIFORNIA
THE CALIFORNIA TAXING AUTHORITIES

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:)	Case No. 08-35653 KRH
)	
CIRCUIT CITY STORES, INC., et al)	Chapter 11
)	
Debtor(s).)	
)	JOINTLY ADMINISTERED
)	
)	
)	
)	
)	
)	

MOTION FOR LEAVE OF COURT TO APPEAR TELEPHONICALLY

TO THE HONORABLE JUDGE OF SAID COURT:

The California Taxing Authorities by and through its undersigned counsel, hereby moves the Court for leave Martha E. Romero, lead counsel for the California Taxing Authorities, to attend the Hearing on Debtors' Motion for Partial Summary Judgment on the Thirty-Seventh Omnibus Objection to Claims (Reduction of Certain Personal Property Tax Claims) On June 8, 2010 at 10:00 a.m., and, in support thereof, would show the Court the following:

1. The California Taxing Authorities holds several claims

1 which are subject to the Thirty-Seventh Omnibus Objection to
2 claims.

3 2. Pursuant to the Court's Supplement Order Pursuant to
4 Bankruptcy Code Sections 102 and 105, Bankruptcy Rules 2002 and
5 9007, and Local Bankruptcy Rules 2002-1 and 9013-1 Establishing
6 Certain Amended Notice, Case Management, and Administrative
7 Procedures dated December 30, 2009, "Upon request, the court may
8 allow counsel to listen to a hearing by telephone. If a matter is
9 contested, counsel must attend in person, unless leave of the is
10 granted on a case by case basis."

11 3. On January 21, 2009, the Court entered an Order Granting
12 Motion of A. Carter Magee, Jr. for an Order Authorizing Martha E.
13 Romero to Appear Pro Hac Vice Pursuant to Local Bankruptcy Rule
14 200-1(E)(2). Said Order is listed as document number 1702.

15 The California Taxing Authorities respectfully request leave
16 of Court for Martha E. Romero to appear telephonically at the
17 Hearing. Martha E. Romero is located in Los Angeles, California.
18 Local Counsel has been retained. However, The California Taxing
19 Authorities' claims and the Motion for Partial Summary Judgment
20 concern the interplay of California tax law and the Bankruptcy
21 Court. Ms. Romero is experienced in California property tax law and
22 has a unique knowledge of the issues regarding The California
23 Taxing Authorities' claims. Given the expenses that would be
24 incurred in both retaining local counsel and having lead counsel
25 travel from California to appear in person in relation to the size
26 of the California Taxing Authorities asserts that the interest of
27 justice be served by allowing Ms. Romero to appear telephonically
28 at the Hearing.

1 WHEREFORE, PREMISES CONSIDERED, The California Taxing
2 Authorities request that Ms. Romero be permitted to appear
3 telephonically at Hearing on Debtors' Motion for Partial Summary
4 Judgement on the Thirty-Seventh Omnibus Objection to Claims
5 (Reduction of Certain Personal Property Tax Claims) on June 8,
6 2010. The California Taxing Authorities further prays for such
7 other relief to which it may show itself entitled.

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9
10 Respectfully submitted

11 Dated: May 14, 2010

ROMERO LAW FIRM

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13 By /s/ MARTHA E. ROMERO
14 MARTHA E. ROMERO (CA-128144)
15 Attorney for Secured Creditors County
16 of Los Angeles, CA
County of Monterey, CA
County of Placer, CA
The California Taxing Authorities
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